



Michael Nance <michaelnancelaw@gmail.com>

US v. Shawna Reid, CR 19-117 JLR

2 messages

Michael Nance <michaelnancelaw@gmail.com>
To: "Hoff, Matthew (CRM)" <Matthew.Hoff2@usdoj.gov>
Cc: robertgombiner@gmail.com
Bcc: shawnareid24@gmail.com

Tue, Oct 20, 2020 at 12:28 PM

Matt,

The defense endorses AUSA Joseph Wheatley and Section Chief David Jaffe as defense witnesses for Ms. Reid. They are percipient witnesses to the alleged crimes and contributing factors to their commission.

Will the government agree to produce them without the need of a formal subpoena or court order?

--
Michael C. Nance
Attorney at Law

P.O. Box 11276
Bainbridge Island, WA 98110
Office: (206) 624-3211

[Please visit my website](#)

Hoff, Matthew (CRM) <Matthew.Hoff2@usdoj.gov>
To: Michael Nance <michaelnancelaw@gmail.com>
Cc: "robertgombiner@gmail.com" <robertgombiner@gmail.com>

Fri, Oct 23, 2020 at 8:20 AM

Mike and Robert,

The government will not agree to produce these witnesses without a subpoena or formal legal process. Further because these are employees from the Department of Justice you are required to comply with 28 C.F.R. § 16.23(c), which provides that:

If oral testimony is sought [from a present or former DOJ employee about a matter within the scope of his or her duties] by a demand in a case or matter in which the United States is a party, an affidavit, or, if that is not feasible, a statement by the party seeking the testimony or by the party's attorney setting forth a summary of the testimony sought must be furnished to the Department attorney handling the case or matter.

Matthew K. Hoff

Trial Attorney

United States Department of Justice

Organized Crime and Gang Section

1301 New York Avenue, N.W., Suite 700

Washington, DC 20005

Office: 202-598-8093

Cell: 202-510-3870

Please note that all voicemail messages are recorded and subject to archiving by the Department of Justice. Please do not leave any substantive information—including information about a case—in your message. If you are not the intended recipient of this email and have received this message in error, please notify the sender of the error and delete the message.

[Quoted text hidden]